

EXHIBIT 2

RESPONSE TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name: Maria E. Sepúlveda Torres

Address: Urb. Los Caobos, Calle Caimito 3131, Ponce, Puerto Rico 00716

Contact Telephone: Home 787-842-3728 Cell _____

II. Title

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico, et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection in reference to the request for unpaid money by the Commonwealth of Puerto Rico:

Proofs of Claim Numbers:

Act 89 – Uniform Compensation, July 1979

#49762 – Act #89 – Romerazo – Effective July 1, 1995

#94057 – Pay Scale Act – Steps, of June 6, 2008.

#96621 – Act #96 (2002) of Dr. Pedro Roselló – Effective July 2002.

Act #164 (2004) of Mrs. Sila Calderón – Effective January 2004

III. The Court must not grant the Omnibus Objection, since this is money that is owed due to the following laws being passed by the government of the Commonwealth of Puerto Rico:

Act 89 – Uniform Compensation, July 1979

Act #89 – Romerazo – Effective July 1, 1995

Pay Scale Act – Steps, of June 6, 2008.

Act #96 (2002) of Dr. Pedro Roselló – Effective July 2002

Act #164 (2004) of Mrs. Sila Calderón – Effective January 2004



IV. Supporting Documentation

Please find enclosed documents that serve as evidence of the years of service with Puerto Rico Telephone Company, Ponce, Puerto Rico, from March 2, 1975 to January 2, 1998. I retired from my job as Service Representative III, at the Puerto Rico Telephone Company, Ponce, Puerto Rico, Commonwealth. The claim made is for the laws that cover these years of ~~educational~~ service.

I have enclosed documents that serve as evidence of this claim.

We are sending the response on this date due to the recent emergency situation caused by earthquakes and COVID-19 in Puerto Rico. If you need additional information or documents, please contact the undersigned.

Man'a E. Sepulveda Torres
Print Name

Man'a E. Sepulveda Torres - 6/29/2021
Signature and Date

Proof of Claim: <CLAIM NUMBER> 176231
 Claimant: <CLAIMANT NAME> Maria E Sepulveda Torres

RECEIVED

JUL 16 2021

INFORMATION REQUESTED TO PROCESS YOUR CLAIM

PRIME CLERK

Instructions

Please answer all four (4) questions and any applicable sub-questions. Please include as much detail as possible in your responses. Your answers should provide more information than the initial proof of claim. For example, if you previously wrote as the basis for your claim "Ley 96," please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim. Additionally, if available and applicable to your claim, please provide:

- Copy of a pleading, such as a Complaint or an Answer;
- Any unpaid judgment or settlement agreement;
- Written notice of intent to file a claim with proof of mailing;
- Any and all documentation you believe supports your claim.

Please send the completed form and any supporting documents via email to PRClaimsInfo@primeclerk.com, or by mail or hand delivery to the following address:

Commonwealth of Puerto Rico Supplemental Information Processing Center
 c/o Prime Clerk, LLC
 850 Third Avenue, Suite 412
 Brooklyn, NY 11232

Questionnaire

1. What is the basis of your claim?

- ☒ A pending or closed legal action with or against the Puerto Rican government
- ☒ Current or former employment with the Government of Puerto Rico
- ☐ Other (Provide as much detail as possible below. Attach additional pages if needed.)

Money owed for raises – Promesa Act

2. What is the amount of your claim (how much money do you claim to be owed):

\$ 26,400.00

3. Employment. Does your claim relate to current or former employment with the Government of Puerto Rico?

- ☐ No. Please continue to Question 4.
- ☒ Yes. Answer Questions 3(a)-(d).

3(a). Identify the specific agency or department where you were or are employed:

Puerto Rico Telephone Co., PR Commonwealth – Service Representative III

3(b). Identify the dates of your employment related to your claim:

From March 2, 1975 to January 2, 1998

3(c). Last four digits of your social security number: 5025

3(d). What is the nature of your employment claims (select all applicable):

☐ Pension

☒ Unpaid Wages

☐ Sick Days

☐ Union Grievance

☐ Vacation

☒ Other (Provide as much detail as possible. Attach additional pages if necessary).

Act 89 of July, 1979 – Uniform Compensation,
and Act 89 of July, 1995 – “El Romerazo”

4. Legal Action. Does your claim relate to a pending or closed legal action?

☒ No.

☐ Yes. Answer Questions 4(a)-(f).

4(a). Identify the department or agency that is a party to the action.

N/A

4(b). Identify the name and address of the court or agency where the action is pending:

N/A

4(c). Case number:

N/A

4(d). Title, Caption, or Name of Case:

N/A

4(e). Status of the case (pending, on appeal, or concluded):

N/A

4(f). Do you have an unpaid judgment? Yes / No (Circle one)

If yes, what is the date and amount of the judgment?

N/A

CLAIMANT: Maria E. Sepúlveda Torres

CASE NUMBER: 17 BK 3283-LTS

CLAIM NUMBER: 176231

Telephone Number: 787-842-3728

Employee Number: [REDACTED]

Claim for money owed from laws approved that apply to me for my years of service since March
2, 1975 to January 2, 1998 as a Service Representative III with the Puerto Rico Telephone
Company – Commonwealth.

1. ~~Act 89, July 1995 ROMERAZO~~ AMOUNT \$

As well as any other laws that may be applicable to me and for which I was not granted the
corresponding compensation.

Thank you for your attention to this matter.

Regards,

Maria E. Sepúlveda Torres
Print Name

Maria E. Sepúlveda Torres 6/29/2021
Signature and Date

	<i>Amount Owed</i>
1) Act 89, July 1979 – Uniform Compensation	\$ 22,800.00
2) Act 89, July 1995 – El Romerazo	<u>\$ 3,600.00</u>
<i>Grand Total</i>	<i>\$ 26,400.00</i>

CLAIMANT: Maria E. Sepúlveda Torres

ADDRESS: Urb. Los Caobos, Calle Caimito 3131, Ponce, Puerto Rico 00716

Claim Number: 176231

Date of Filing (Mailing): June 29, 2021

I hereby include the following documents with my claim filed on June 29, 2021:

1. Proof of employment with Puerto Rico Telephone Company, in Ponce, Puerto Rico – Commonwealth, as Service Representative III, from March 2, 1975 to January 2, 1998. (See attached evidence)
2. The amount owed in my claim is \$ 26,400.00.

Thank you for your prompt attention to my petition.

Regards,

Maria E. Sepúlveda Torres
Print Name

Maria E. Sepúlveda Torres 6/29-2021
Signature and Date



PRT/CLARO
P.O. Box 360998
San Juan PR 00936-0998

CERTIFICATION

MARIA E. SEPULVEDA
XXX-XX- 5025

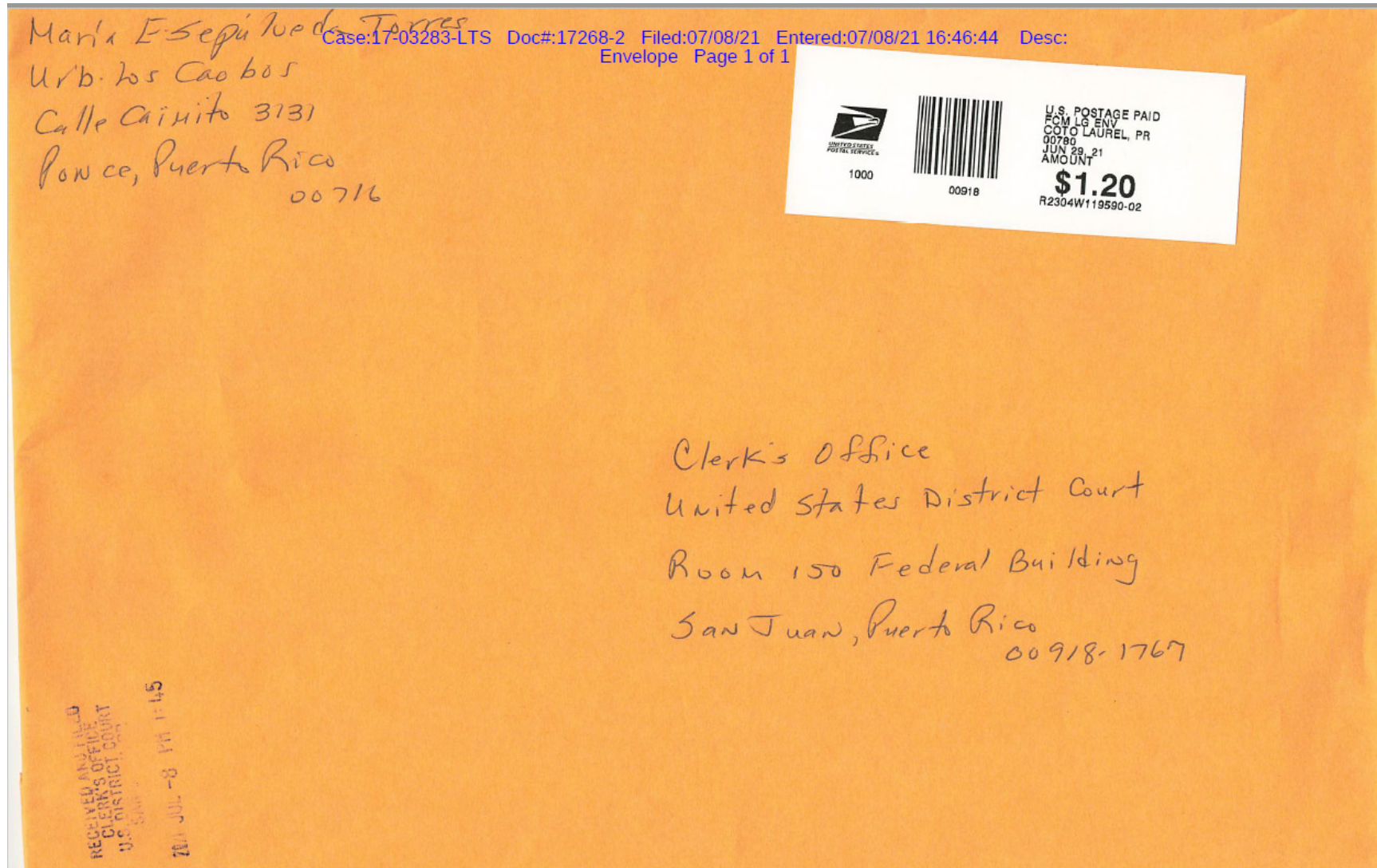
Regarding the above-referenced former employee, we certify as follows:

- She joined PRT/Claro on 02/03/1975.
- She worked as a regular employee until 02/01/1998

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Monday, June 14, 2021.

Abigail Alejandro González

Abigall Alejandro González
Compensation Officer
Compensation and Records





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A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 176231 ECF No. 17268**

Signed this 12th day of August, 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

